

**From:** [Doug Durbin](#)  
**To:** [Sarah.Hansen@deq.idaho.gov](mailto:Sarah.Hansen@deq.idaho.gov)  
**Cc:** [Godsey, Cindi](#); [AJ.Maupin@deq.idaho.gov](mailto:AJ.Maupin@deq.idaho.gov)  
**Subject:** RE: Midas Gold answers  
**Date:** Wednesday, December 06, 2017 1:05:39 PM  
**Attachments:** [image001.png](#)

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Great information. Thanks Sarah!

Best Regards,

**Douglas J. Durbin, Ph.D.**  
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**From:** Sarah.Hansen@deq.idaho.gov [mailto:Sarah.Hansen@deq.idaho.gov]  
**Sent:** Wednesday, December 06, 2017 3:44 PM  
**To:** Doug Durbin <ddurbin@BrwnCald.com>  
**Cc:** godsey.cindi@epa.gov; AJ.Maupin@deq.idaho.gov  
**Subject:** Midas Gold answers

Hi Doug!

It was good to speak with you again. I have rounded up my resources and will hopefully provide you either the answer or a way to follow up with those individuals best suited to answer your question(s).

1. In order to reissue a reuse permit, an application must be completed and submitted six months prior to expiration of the current permit. This means an application would need to be submitted by July 16, 2018. In order to develop an appropriate permit, a pre-application conference is scheduled to discuss any changes to the facility which the engineer will need to evaluate. The Boise Regional DEQ office will be the issuing office for the Midas Gold reuse permit. The engineer to contact for further inquiry: Gary Carroll, Engineer, (208) 373-0117, or [gary.carroll@deq.idaho.gov](mailto:gary.carroll@deq.idaho.gov).
2. The tiering status for antidegradation purposes is determined on a waterbody by waterbody and stream segment by stream segment approach. To help the permittee understand the relationship, one must first identify the receiving water impacted by the discharge using the online integrated report interactive mapper and establish the water body's uses, status, and any applicable TMDLs. Secondly, you consult the Antidegradation Implementation Guidance ([Draft Antideg](#)) to determine the Tiering of the receiving water based on the beneficial uses identified from the mapper and the pollutant(s) of concern to determine the most sensitive

use which needs protection. This draft document is managed by the surface water staff and is expected to go out for a 2<sup>nd</sup> public comment in the spring of 2018.

3. DEQ uses outside data as described in section 4.2 of the Watershed Body Assessment Guidance – 3<sup>rd</sup> edition ([WBAG3](#)). A simplified overview of the tiers of data is found in Table 5, pg. 30. DEQ only uses Tier 1 data for assessment purposes, but may use Tier 2 and 3 data for other purposes. The Integrated Report (IR) process accommodates data input from outside sources at two points, (1) During a Call for Data, and (2) During a public comment period of a draft IR.

The Call for data for the 2016 IR has already passed, and the anticipated Call for Data for the 2018 IR will occur roughly in February 2019. There is a notification list to which I have added your contact info for notification of this request. If you have additional questions, please contact our Federal Reporting Coordinator in the state DEQ office at: Amy Steimke, (208) 373-0153, or [amy.steimke@deq.idaho.gov](mailto:amy.steimke@deq.idaho.gov). The opportunity to provide data will occur during the public comment period of the draft 2016 IR in about October 2017. You will be notified via email of this period.

I hope this helps you in the permit applications process. I will be working closely with Cindi Godsey and Brown and Caldwell in the future to further refine our understanding of the options and in anticipation of receiving an actual application. Please let me know if I can assist you with anything from the Idaho side.



**Sarah Hansen, REHS, Industrial Permit Specialist**  
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